

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Carol Knaak, Wanda Firchau,
and Kay Oliver, et al.,

Court File No. 13-CV-00829 (JRT/AJB)

Plaintiffs,

v.

Armour-Eckrich Meats LLC,

Defendant.

DEFENDANT'S MOTION TO ENFORCE SETTLEMENT

COMES NOW Defendant Armour-Eckrich Meats LLC ("Armour-Eckrich") and moves this Court to enter an Order enforcing the Settlement Agreement approved by this Court by Order of July 1, 2014 (Doc. 107). Specifically, Defendant moves the Court to enter an Order compelling Class Counsel to send the Court-approved Class Notice and Claim Form to all Class Members who are in the Class as defined by this Court's Order. Since the Court entered that Order, Class Counsel have notified Defendant's Counsel that they will not send the Class Notice and Claim Form to 114 of the Class Members unless Defendant agrees to pay more money than the it agreed to pay in the Court-approved Joint Stipulation of Settlement and Release (Doc. 101-1).

By refusing to send the Class Notice and Claim Form to all Class Members, Class Counsel are threatening to violate the Joint Stipulation of Settlement and Release. The deadline for Class Counsel to send the Class Notice and Claim Form to all Class Members is July 31 (thirty days after this Court's July 1 Order). Therefore, Defendant

requests that this Court issue an order as soon as possible requiring Class Counsel to send the Class Notice and Claim Form to all Class Members.

WHEREFORE, Defendant Armour-Eckrich moves this Court to enter an Order enforcing the Settlement and compelling Class Counsel to send the Class Notice and Claim Form to all Class Members, as the Class is defined in this Court's July 1, 2014 Order (Doc. 107).

Respectfully submitted,

Dated: July 21, 2014.

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